

APR 27 1995

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

ORIGINAL

In the Matter of	)	
	)	
Billed Party Preference	)	CC Docket No. 92-77
for 0+ InterLATA Calls	)	
	)	
Disclosures by Operator	)	DOCKET FILE COPY ORIGINAL
Service Providers Serving	)	RM-8606
Public Phones	)	DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS**

MCI Telecommunications Corporation (MCI) hereby submits its reply comments in the above-referenced proceeding. The comments filed demonstrate that the Joint Petitioners' rate ceiling proposal is not in the public interest because it would not benefit consumers or promote competition and, therefore, should be discarded. In addition, the comments demonstrate that the National Association of Attorneys General (NAAG) proposed disclosure message would impose an unnecessary requirement on operator service providers (OSPs) who comply with existing rules and would not prevent abuses by those who do not. Therefore, this proposal also should be rejected.

With regard to the rate ceiling proposal, MCI and others have shown that "rate gouging" is not the only remaining concern affecting the operator services market and that a rate ceiling would do nothing to eliminate the other problems. In addition, most of the Joint Petitioners' proposed rates are significantly higher than the current

operator services rates charged by the major interexchange carriers. Therefore, in the eyes of most consumers, the Joint Petitioners' proposal would not resolve the problem of "rate gouging." Rather, consumers still could be charged rates in excess of those reasonably anticipated; however, those rates will have been sanctioned by the Commission.

The comments also demonstrate that, contrary to the Joint Petitioners' assertions, a rate ceiling would not be an administratively simple thing to implement or enforce. Not only would the Commission have to conduct proceedings to establish the ceiling, which likely would be challenged in court, it would have to conduct proceedings in connection with OSPs who charge rates in excess of the ceiling. And, the Commission would have to expend considerable resources enforcing the rate ceiling if it is to be at all effective.

Finally, the rate ceiling concept is not an effective substitute for billed party preference (BPP) because it would not provide consumers with the competitive benefits that BPP offers. Only with implementation of BPP will consumers be able to reach their carrier-of-choice through the convenience of 0+ dialing; will "equal access" be achieved in the operator services market; and will the competitive advantages which are the vestiges of AT&T's monopoly be eliminated.

Thus, the facts have been presented; the positions of the parties are well known; and it is time for the

Commission to decide whether it will protect consumers and encourage true competition, or whether it will continue to protect some industry participants. Applying the public interest standard, there really is no choice -- the Commission must implement BPP.

A number of commenters support MCI in opposing the NAAG's proposal because it would not be effective in preventing operator services abuses and it would unnecessarily burden law-abiding OSPs. As demonstrated, under current requirements, OSPs must charge reasonable rates and disclose rate information on request. Thus, for carriers complying with the existing rules, the NAAG's proposal would impose an unnecessary regulatory burden that would increase carrier costs which, ultimately, would result in higher rates for consumers. Moreover, carriers not complying with the current requirements are not likely to comply with the NAAG's proposal. Accordingly, the NAAG's proposal should be rejected.

Based on the foregoing and MCI's initial comments, MCI urges the Commission to reject the Joint Petitioners' ex

parte and the NAAG's petition and, instead, promptly order the implementation of BPP.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 27th day of April 1995, copies of the foregoing "REPLY COMMENTS" in CC Docket No. 92-77 and RM 8606 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.

  
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